

<b>Gates Formed-Fibre Products, Inc.</b>	)	<b>Departmental</b>
<b>Androscoggin County</b>	)	<b>Findings of Fact and Order</b>
<b>Auburn, Maine</b>	)	<b>Air Emission License</b>
<b>A-678-71-B-M</b>	)	<b>Amendment #1</b>

After review of the air emissions license amendment application, staff investigation reports and other documents in the applicant's file in the Bureau of Air Quality, pursuant to 38 M.R.S.A., Section 344 and Section 590, the Department finds the following facts:

## **I. REGISTRATION**

### **A. Introduction**

1. Gates Formed-Fibre Products, Inc. (GFFP) of Auburn, Maine was issued Air Emission License A-678-71-A-N on August 20, 2001, permitting the operation of emission sources associated with their non-woven fiber products facility.
2. GFFP has requested a minor revision to their license in order install two cleaning ovens.

### **B. Emission Equipment**

GFFP is authorized to install the following equipment:

#### **Fuel Burning Equipment**

<b><u>Equipment</u></b>	<b><u>Maximum Capacity (MMBtu/hr)</u></b>	<b><u>Maximum Firing Rate (scf/hr)</u></b>	<b><u>Fuel Type, % sulfur</u></b>	<b><u>Stack #</u></b>
Cleaning Oven #1	1.50	1430	natural gas, neg.	7
Cleaning Oven #2	1.50	1430	natural gas, neg.	7

### **C. Application Classification**

The modification of a minor source is considered a major modification based on whether or not expected emission increases exceed the "Significant Emission Levels" as given in Maine's Air Regulations. This modification is determined to be a minor revision and has been processed as such.

## **II. BEST PRACTICAL TREATMENT (BPT)**

### **A. Introduction**

In order to receive a license the applicant must control emissions from each unit to a level considered by the Department to represent Best Practical Treatment (BPT), as defined in Chapter 100 of the Air Regulations. Separate control requirement categories exist for new and existing equipment as well as for those sources located in designated non-attainment areas.

BPT for new sources and modifications requires a demonstration that emissions are receiving Best Available Control Technology (BACT), as defined in Chapter 100 of the Air Regulations. BACT is a top-down approach to selecting air emission controls considering economic, environmental and energy impacts.

### **B. Cleaning Ovens #1 and #2**

Cleaning Ovens #1 and #2 are each 1.5 MMBtu/hr batch cleaning ovens, used for the purpose of parts cleaning. The ovens are equipped with monitors that sense ignition and also with water mist injection to quench any flames that occur. Each Cleaning Oven is also equipped with an afterburner.

Based on the relatively small size of the cleaning ovens, and the quantity of pollutants that could potentially be emitted, it is determined by the Department that any additional add-on control device would be economically unjustified. Therefore, BPT for Cleaning Oven #1 and #2 shall be the use of afterburners and the firing of natural gas.

A summary of the BACT analysis for each of the pollutants is discussed below:

1. PM and PM<sub>10</sub> emission rates are based upon AP-42 data dated 7/98 for natural gas combustion.
2. SO<sub>2</sub>, NO<sub>x</sub>, CO and VOC emission rates are based upon AP-42 data dated 7/98 for natural gas combustion.
3. Visible emissions from each oven shall not exceed 10% opacity on a six-minute block average basis, except for no more than 1 six-minute block average in any three-hour period.

### **C. Annual Emission Restrictions**

Since GFFP fired natural gas prior to installation of the cleaning ovens, and is not increasing the annual limit for natural gas combustion, annual emissions restriction shall remain the same as those set forth in Air Emission License A-678-71-A-N.

Gates Formed-Fibre Products, Inc. )  
Androscoggin County )  
Auburn, Maine )  
A-678-71-B-M 3

**Departmental  
Findings of Fact and Order  
Air Emission License  
Amendment #1**

### **III.AMBIENT AIR QUALITY ANALYSIS**

According to the Maine Regulations Chapter 115, the level of air quality analyses required for a renewal source shall be determined on a case-by case basis. Based on the total facility emissions, GFFP is below the emissions level required for modeling and monitoring.

### **ORDER**

Based on the above Findings and subject to conditions listed below, the Department concludes that the emissions from this source:

- will receive Best Practical Treatment,
- will not violate applicable emission standards,
- will not violate applicable ambient air quality standards in conjunction with emissions from other sources.
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The Department hereby grants Air Emission License Minor Revision A-678-71-B-M, subject to the conditions found in Air Emission License A-678-71-A-N, in addition to the following conditions:

### **SPECIFIC CONDITIONS**

(24) Cleaning Ovens #1 and #2

- A. Visible emissions from each oven shall not exceed 10% opacity on a six-minute block average basis, except for no more than 1 six-minute block average in any three-hour period.
- B. Emissions shall not exceed the following:

Equipment		PM	PM <sub>10</sub>	SO <sub>2</sub>	NO <sub>x</sub>	CO	VOC
Cleaning Oven #1	lb/hr	0.01	0.01	0.01	0.15	0.12	0.01
Cleaning Oven #2	lb/hr	0.01	0.01	0.01	0.15	0.12	0.01

- (25) Visible emissions from the fiberbed system shall not exceed 10% opacity on a six-minute block average basis.

**Gates Formed-Fibre Products, Inc.**  
**Androscoggin County**  
**Auburn, Maine**  
**A-678-71-B-M**

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**4**

**Departmental**  
**Findings of Fact and Order**  
**Air Emission License**  
**Amendment #1**

(26) This amendment shall expire concurrently with Air Emission License A-678-71-A-N.

DONE AND DATED IN AUGUSTA, MAINE THIS                      DAY OF                      2001.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: \_\_\_\_\_  
MARTHA G. KIRKPATRICK, COMMISSIONER

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: October 18, 2001

Date of application acceptance: October 22, 2001

Date filed with the Board of Environmental Protection: \_\_\_\_\_

This Order prepared by Elisha McVay, Bureau of Air Quality.